



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

SEP 15 2003

REPLY TO THE ATTENTION OF:

DE-9J

Ms. Karen Nesbitt  
Ohio Environmental Protection Agency  
2110 E. Aurora Road  
Twinsburg, Ohio 44087

Re: Republic Technologies International, LLC, Lorain Ohio

Dear Karen:

I am writing in response to your request for information regarding U.S. EPA's review of the cleanup of contaminated soil around the No. 2 Ladle Metallurgical Furnace baghouse and the four associated baghouse dust collection bins ("baghouse and dust bins") performed by Republic Technologies, LLC (Republic) at its steel-making facility in Lorain, Ohio. By way of background, U.S. EPA determined that there had been releases of hazardous waste in the vicinity of the baghouse and dust bins based on a multimedia inspection of the facility conducted in October 1997. More specifically, during the operation of the baghouse and emptying of the dust bins, Republic's predecessor allowed baghouse dust containing lead and other metals to spill onto the ground in the immediate vicinity of the dust bins.

During negotiations relating to possible settlement of claims arising from releases of the baghouse dust, Republic collected samples to determine the extent of contamination in the immediate vicinity of the baghouse and dust bins, and based on the results of those samples, Republic implemented certain cleanup measures. The cleanup measures included excavating soils contaminated with lead above 340 mg/kg, disposing 131 tons of excavated soil off-site, paving the area beneath the baghouse and the dust bins with asphalt, installing sheet metal between each of the dust bins and the underlying asphalt pavement, and rotating each dust bin 180° for better dust removal. Based on a June 18, 2002 letter report provided by AWS Remediation, Inc. to Republic which describes the cleanup and assuming that the information provided in this report is accurate and complete, U.S. EPA believes that the measures implemented by Republic adequately address concerns raised by the releases of baghouse dust from the No. 2 Ladle Metallurgical Furnace Baghouse dust collection bins.

U.S. EPA has not conducted facility-wide sampling at the facility, and has not drawn conclusions about whether other portions of the facility present environmental risks. This letter is not intended to create substantive rights in third parties, and U.S. EPA reserves its rights to address contamination in the vicinity of the Ladle Metallurgical Furnace baghouse if information provided by Republic was incomplete or inaccurate, or if U.S. EPA subsequently obtains additional information demonstrating that any residual contamination in this areas presents a threat to public health or the environment.

Please contact Christine M. Liszewski, Associate Regional Counsel, at 312/886-4670 or me at 312/886-7568 if you have any questions.

Respectfully yours

A handwritten signature in black ink that reads "Robert Dean Smith". The signature is written in a cursive, slightly slanted style.

Robert Dean Smith, LPG  
Compliance Section 1  
Enforcement and Compliance Assurance Branch  
Waste, Pesticides and Toxics Division

cc: Steven Willey, U.S. DOJ  
Wendlene Lavey, Squire Sanders & Dempsey

bcc: Christine M. Liszewski, ORC





## Waste, Pesticides and Toxics Division

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist  
☐ No Violation Letter and Inspection Report/Checklist  
☐ Letter of Acknowledgment  
☐ Information Request  
☐ Pre-Filing and Opportunity to Confer  
☐ State Notification of Enforcement Action

Facility Name : Republic Technologies International, LLC

Facility Location: 1801 E 28<sup>th</sup> Street

City: LORAIN State: OH

U.S. EPA ID# DHR DDDO37713

Assigned Staff R. Smith Phone: 6-7568

| Name             | Signature       | Date |
|------------------|-----------------|------|
| Author           | <u>B. Smith</u> |      |
| Regional Counsel |                 |      |
| Section Chief    |                 |      |
| Branch Chief     |                 |      |

### Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
  - One copy for the assigned staff;
  - One copy for the section file;
  - One copy for the branch file; and
  - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.  
Once the certified mail receipt is returned:
5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7<sup>th</sup> floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

